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9 **BEFORE THE**
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. *2011-458*

12 **SUZANNE FAULKNER, a.k.a. SUZANNE**
13 **MARIE FAULKNER, a.k.a. SUZANNE**
14 **MARIE MOORE, a.k.a. SUZANNE**
MARIE WELLS
15 **P.O. Box 1854**
Pittsboro, NC 27312
Registered Nurse License No. 531921

A C C U S A T I O N

16 Respondent.

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19 Complainant alleges:

20 **PARTIES**

21 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
22 official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department
23 of Consumer Affairs.

24 2. On or about April 25, 1997, the Board of Registered Nursing issued Registered Nurse
25 License Number 531921 to Suzanne Faulkner, also known as Suzanne Marie Faulkner, also
26 known as Suzanne Marie Moore, also known as Suzanne Marie Wells (Respondent). The
27 Registered Nurse License was in full force and effect at all times relevant to the charges brought
28 in this Accusation and will expire on January 31, 2011, unless renewed.

JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811, subsection (b), of the Code, the Board may renew an expired license at any time within eight years after the expiration.

6. Section 118, subsection (b), of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

STATUTORY PROVISIONS

7. Section 2761 of the Code states:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

"(a) Unprofessional conduct, which includes, but is not limited to, the following:

...

"(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action."

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10. The underlying conduct supporting the North Carolina Board's disciplinary action is that while employed at Moses Cone Health System in Greensboro, North Carolina in or about 2007 and 2008, Respondent falsified information in a patient's medical record and exceeded her scope of practice as a licensed nurse.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this Accusation, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 531921, issued to Suzanne Faulkner, also known as Suzanne Marie Faulkner, also known as Suzanne Marie Moore, also known as Suzanne Marie Wells;

2. Ordering Suzanne Faulkner, a.k.a. Suzanne Marie Faulkner, a.k.a. Suzanne Marie Moore, a.k.a. Suzanne Marie Wells to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

3. Taking such other and further action as deemed necessary and proper.

DATED: November 15, 2010

Louise R. Bailey
LOUISE R. BAILEY, M.ED., RN
Interim Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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